

**North West PCS, Inc.  
P.O. Box 172  
Fort Jennings, OH 45844**

April 12, 2002

Ms. Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

***Re: CC Docket No. 94-102 / Quarterly TTY Implementation Report  
Broadband PCS Station WPOI234  
BTA255 F2 – partitioned from the Lima, Ohio BTA***

Dear Ms. Salas:

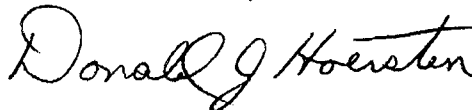
North West PCS, Inc. ("NWPCS") hereby submits its April 2002 quarterly report on implementation of TTY access to 9-1-1 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, *released* December 14, 2000.

We are the licensee of station WPOI234 (F2 Block – Lima, Ohio BTA) in the Broadband Personal Communications Service (PCS). Our newly-constructed system uses Motorola CDMA base station equipment and we obtain switching services from Horizon PCS, Inc. ("Horizon"). Horizon uses a switch from Nortel Networks (Nortel), and it is dependent on Nortel for the provision and installation of the software upgrades necessary to allow TTY/TDD functionality. According to Horizon, certain problems have arisen during the integration testing of Motorola's TTY software with the Nortel switch, resulting in high character error rates. It is our understanding that Motorola is working closely with its larger customers, including Sprint PCS, to resolve these problems. However, if Motorola continues to experience unacceptably high error rates with its software, our deployment TTY capability may be delayed.

We are encouraged by the progress that Nortel and Motorola have made in developing a TTY solution for CDMA carriers, and we look forward to the results of further integration testing and user trials that are being conducted by Sprint PCS. However, NWPCS is a small carrier that has contracted with another company for switching services, and we do not have the resources to participate in beta testing of network software and infrastructure equipment. Nevertheless, we will make every effort to implement TTY capability in our market by the June 30, 2002 deadline.

Respectfully submitted,

**NORTH WEST PCS, INC.**



Donald J. Hoersten, President

**North West PCS  
E911 TTY Device Capability Report for April, 2002**

**I. DEVELOPMENT ACTIVITIES**

- 1) **Network Infrastructure Software Development** – North West PCS (“NWPCS”) has chosen CDMA technology for its broadband PCS network. Our newly-constructed system uses Motorola base station equipment and we obtain switching services from Horizon PCS, Inc. (“Horizon”). Horizon uses a switch from Nortel Networks (“Nortel”), and it is dependent on Nortel for the provision and installation of the software upgrades necessary to allow TTY/TDD functionality. According to Horizon, certain problems have arisen during the integration testing of Motorola’s TTY software with the Nortel switch, resulting in high character error rates. It is our understanding that Motorola is working closely with its larger customers, including Sprint PCS, to resolve these problems. However, if Motorola continues to experience unacceptably high error rates with its software, our deployment TTY capability may be delayed.
- 2) **Handset Development and Testing Plans** – We are following the CDMA handset development and interoperability testing that is being performed by Sprint PCS. We will work with our suppliers to acquire these units as soon as possible.
- 3) **Beta Testing and Lab Testing** –NWPCS is a small carrier, and is looking to its equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, NWPCS will test the equipment it procures as soon as it is available, to make sure it meets the manufacturer’s specifications.
- 4) **Release and General Availability to Carriers of Network Infrastructure Software** – See answer to #1, above. We also direct the Commission’s attention to recent TTY status reports filed by Sprint PCS, Motorola and Nortel, which we understand will be included in the April 2002 report in CC Docket No. 94-102 by ATIS/TTY Forum.
- 5) **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.
- 6) **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY** – Dependent on handset vendors for enhanced TTY devices.
- 7) **Carrier Coordination of Testing with PSAP** – NWPCS will test with the PSAPs in the areas where its service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel.
- 8) **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Each of these will be tested once equipment, software availability, deployment, installation, and turn up are completed.

- 9) **Retail Availability of Necessary Consumer Equipment** – Retail availability will be implemented by NWPCS when compatible handsets are ready for rollout.
- 10) **Geographic Scope of Network Infrastructure Deployment** – Since our network uses only one switch, as software becomes available, it will be deployed across our whole network. Likewise, as TTY compliant handsets become available we will offer them in all retail locations.